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Sacramento, CA
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Mr. Rick Woodard
Water Quality Program Manager
CALFED Bay-Delta Program
1418 Ninth Street, Ste. 1155
Sacramento, CA 95814

Dear Mr. Woodward:

I appreciated the opportunity to participate in the November 20 meeting of the Water Quality Technical Work Group. DowElanco is the primary registrant of the pesticide chlorpyrifos, a commonly used pest control material in California in both agricultural and urban settings. Immediately prior to the November 20 meeting I learned that chlorpyrifos had been identified as a Parameter of Concern within the CALFED process. We are extremely interested in CALFED and look forward to further participation.

DowElanco is currently involved in extensive research efforts to further expand the science related to chlorpyrifos and surface water. In addition, we have initiated several educational outreach and Best Management Practice programs, working with groups including the Department of Pesticide Regulation, State and Regional Water Boards, agricultural user groups, urban water interests and other registrants. Based on the limited exposure I have had to CALFED there would seem to be significant opportunities to expand and improve these efforts cooperatively.

Your memo of November 7 indicated that it had been determined that it was necessary to expand the technical evaluation process to include affected interests. While DowElanco would certainly have preferred to be involved in the process earlier, particularly discussions involving our products, we will work diligently to provide constructive input in the future. As I mentioned at the November 20 meeting, the short time period between receipt of information and the meeting on December 9 will not practically allow for thorough comments on Acceptable Ranges of Parameters of Concern or Water Quality Actions for chlorpyrifos within the context of CALFED objectives. We should be able to provide those comments before the end of December.

Three pesticides on the list of Parameters of Concern are active ingredients of currently used proprietary products. I have notified registrants of the other two pesticides of CALFED activities and they were very interested in getting involved. I have also recommended that a representative of the Western Crop Protection Association engage in the process. These representatives are all currently active in stewardship activities and research related to pesticides and surface water, but were previously unaware of CALFED activities on this topic.

I look forward to working with the CALFED process on future activities.

Regards,

Bryan L. Smart
Manager, Government Relations